

# **Exhibit B**

**In The Matter Of:**

*Students for Fair Admissions, Inc. v.  
President and Fellows of Harvard College, et al.*

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*Marlyn Elizabeth McGrath*

*June 18, 2015*

*Highly Confidential*

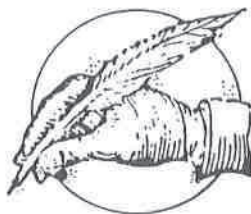
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1 grounds of race?

2 MR. WOLFSON: Objection.

3 Go ahead.

4 A. We often have alumni say, you know, "You admitted  
5 too many of this" or "too few of that." This could be any  
6 kind of characteristic, and it certainly has been applied  
7 to race.

8 Q. When you say "alumni," are you talking about  
9 alumni interviewers?

10 A. I'm thinking of alumni interviewers, but I  
11 wouldn't limit it to --

12 Q. Can you recall any specific alumni interviewer  
13 concerns regarding discrimination against Asian-Americans  
14 in the admissions process?

15 MR. WOLFSON: Objection.

16 Go ahead.

17 A. We have a -- and I'm not going to remember her  
18 name. I'm not sure that I ever knew it. But we have an  
19 alumnus -- alumna in New York State somewhere, Northern New  
20 York, not in New York City, who I believe was Asian-  
21 American herself and who thought that we discriminated  
22 against Asian-Americans, and she wanted to have -- and she  
23 wanted to have an event around that, sponsored by the  
24 Harvard Club, whichever place it was. And I heard that one

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1 because the area person asked me -- wanted me to know and  
2 asked me about whether they should go.

3 Q. You don't remember the name of this person?

4 A. I don't.

5 Q. Do you remember who the area coordinator was?

6 A. Yes, I do, I think. The person who told it to me  
7 was is his name. I think he was the area  
8 person who heard it directly.

9 Q. Do you recall when this was?

10 A. I think it was -- I think it was two years ago.  
11 It may have been last spring. It may have been a year ago.  
12 I mean, you know, a year ago, but it may also have been two  
13 years ago. It was after the process was over. Also, the  
14 Connecticut Club, the only other one I remember is that the  
15 Connecticut Club had a similar, they wanted to discuss the  
16 topic because some member of the club, who I never knew who  
17 it was, didn't ask, felt that this was a topic for  
18 discussion.

19 Q. Before we go on to the Connecticut Club, do you  
20 remember what the basis of the alumnus who was in New York  
21 State, the basis of her complaint was?

22 A. No, I don't. I don't think I ever knew that,  
23 actually.

24 Q. And is that also true with respect to the

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1 Connecticut Club?

2 A. Yes. Yes.

3 Q. Who would have had responsibility for  
4 communications with the Connecticut Club?

5 A. I don't remember who this was, actually, who  
6 brought this to my attention. It could have been  
7 , but I think I'm remembering that wrong. I don't  
8 remember. It came to me indirectly.

9 Q. How did it come to you?

10 A. Some member of my staff. Might have been .

11 Q. I'd like to hand you a document that I'm going to  
12 ask the reporter to mark as Exhibit 1.

13 (Exhibit 1, Harvard University fall  
14 2015 application supplement, marked.)

15 MR. WOLFSON: Be sure you look  
16 carefully at the exhibit.

17 Q. I'd ask you to review the exhibit and let me know  
18 when you've had a chance to look it over. (Pause.) Have  
19 you had a chance to review this?

20 A. Yes, I have.

21 Q. Do you recognize this document?

22 A. I do.

23 Q. What is this document?

24 A. That's what's known as the Harvard supplement.